

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20311-WILLIAMS

UNITED STATES OF AMERICA,

v.

ESTEBAN EDUARDO MERLO HIDALGO,

Defendant.

/

**MOTION FOR DOWNWARD DEPARTURE PURSUANT
TO SECTION 5K1.1 OF THE UNITED STATES SENTENCING GUIDELINES**

Pursuant to Section 5K1.1 of the United States Sentencing Guidelines, the United States of America hereby moves for a forty percent (40%) reduction in the sentence of the defendant, Esteban Eduardo Merlo Hidalgo, in order to reflect his substantial assistance in the investigation and prosecution of others. In support thereof, the government states the following:

1. On July 14, 2022, the defendant was charged, along with two codefendants, in a seven-count Indictment.
2. On March 29, 2023, the defendant pleaded guilty to four counts of engaging in transactions in criminally derived property in violation of Title 18, United States Code, Section 1957.
3. Sentencing in this matter is scheduled for December 19, 2023.
3. The defendant agreed to assist in the investigation of other persons. The defendant has provided timely and useful cooperation to the United States.

4. Based on the defendant's cooperation, the United States submits that the defendant has provided substantial assistance entitling him to a sentence reduction under Section 5K1.1 of the U.S. Sentencing Guidelines.

5. Defendant's counsel joins in this motion, but will make any additional arguments regarding sentencing at the hearing.

CONCLUSION

Based on the defendant's cooperation, the United States respectfully recommends that this Court reduce the defendant's sentence by forty percent (40%) from the applicable term of imprisonment.

Respectfully submitted,

GLENN S. LEON
CHIEF, FRAUD SECTION

By: /s/ Katherine Raut
Katherine Raut
Court ID No. A5502213
Anthony Scarpelli
Trial Attorneys
Alexander Kramer
Assistant Chief
Department of Justice
1400 New York Ave., N.W.
Washington, D.C. 20005
Telephone: (202) 616-2577
katherine.raut@usdoj.gov